

Collecting Government Revenues





To help the public
service spend wisely



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EXECUTIVE SUMMARY

A government relies on its ability to collect revenues in order to deliver services to the public. There is an expectation that government will have in place the management framework needed to ensure that it collects and manages revenues efficiently and effectively, in accordance with established legislation and regulations.

We found that the Government of Cayman Islands in most cases collects revenues in accordance with legislation, although it could do more to ensure compliance. Ensuring compliance with legislation, however, is not sufficient. Government also needs to enhance its management practices, processes and systems to ensure that it collects revenues more efficiently to achieve better value-for-money.

Fundamental to the effective management of revenues for the Government is adherence to the PFML—*Public Management and Finance Law (2013 Revision)*—and adherence to generally accepted business practices. While we found that coercive revenues are collected in compliance with legislation, we also found that in the absence of policies and procedures for processing revenue waivers (or concessions), they are not granted in a consistent and transparent manner. As a result, we were unable to assess how waivers are managed, processed, or tracked, nor were we able to assess the reasonableness of the dollar value of waivers granted.

We identified a number of examples where Government systems and processes are not integrated among departments and authorities, which tend to operate in isolation. Increased integration could result in opportunities to save resources and make better use of staff. We identified areas where changes to processes and controls could improve assurance that revenues owing to Government are fully collected.

We found that relevant financial information and analysis are available for Cabinet’s responsibilities—such as the Strategic Plan Summary, budget documents and quarterly financial reports—although sometimes too late for decision making. The planning documents are also available on the Government’s website, though again, not always on a timely basis. The Government’s inability to produce audited Entire Public Sector consolidated financial statements precludes the accountability required for Government revenues.

We found that the Government has failed to establish the following elements needed to ensure that it collects revenues with due regard to value for money:

- a risk management framework with a process in place to adequately assess and manage risks to achievement of revenue objectives;
- a control framework with appropriate controls to ensure that all revenues are fully collected;
- a framework for work permit fees that allows for streamlined approach to processing work permits in order to improve value-for-money and administration of work permits;
- a financial reporting framework whereby reports are provided to Cabinet and the Legislative Assembly on a timely and consistent basis; and
- a performance reporting framework that includes objectives, goals, performance indicators and performance analysis for responsibilities relating to the collection of revenues.

Senior management is responsible for ensuring that a management control framework, consisting of appropriate policies, procedures and controls, is in place and is operating efficiently and effectively. The Government has made some strides in developing elements of a management control framework for revenue. However, it still needs to develop and implement more efficient and effective practices and procedures to improve collection and management of Government revenues.

INTRODUCTION

COLLECTING REVENUE IN THE CAYMAN ISLANDS GOVERNMENT

1. Revenue is the inflow of cash, receivables or other considerations arising in the course of an entity's ordinary activities. In the Cayman Islands Government, there are two different types of revenue:
 - entity revenue; and
 - executive or coercive revenue.
2. According to its unaudited financial reports for 2013-14, the Government realized almost \$650 million in revenue from various sources (not including the statutory authorities and government companies). Approximately 95% of this is coercive revenue—revenues collected by government under its coercive powers authorized under various laws passed by the Legislative Assembly (e.g. duties, work permit fees, bank fees, etc.)¹ and for which there is no direct exchange of any goods or services. The remainder, called entity revenue, involves the sale of goods and services and is authorized by the Legislative Assembly through annual budgetary legislation².
3. Total revenue grew by 36% between 2009 and 2014, increasing each year. This growth resulted from new fees, increases to existing fees, and growth in the local economy. In fiscal year 2013-14, core Government's revenue totaled \$647.3 million (see Exhibit 1).

Exhibit 1 – Government revenues 2009-10 to 2013-14

Cayman Islands Government Revenues (\$million)					
Revenue Type	2009-10	2010-11	2011-12	2012-13	2013-14
Executive	\$ 451.1	\$ 482.1	\$ 487.1	\$ 585.7	\$ 612.8
Entity	24.2	52.7	58.1	34.9	33.4
Other	0.5	1.1	5.0	1.4	1.1
Total	\$475.8	\$535.9	\$550.2	\$622.0	\$647.3

¹ As defined in the *PMFL (2013 Revision)*, page 8

² As defined in the *PMFL (2013 Revision)*, page 9

4. The Government generates revenue from the provision of a wide-range of activities and services. The major sources of revenue include: import duties, company registration fees, work permit fees, mutual fund administrator fees, banks and trust license fees, partnership fees, stamp duties, and tourist accommodation charges. Together, three departments and one statutory authority were responsible for collecting over 73% of total government revenue for the year ended 30 June 2014 (see Exhibit 2).

Exhibit 2 – Departments/Authorities managing significant revenues

Department/Authority	2014 revenues (\$million)	% of total revenues
Customs	\$164	25.4
General Registry	\$131	20.3
Cayman Islands Monetary Authority	\$107	16.5
Immigration	\$73	11.2
Total	\$475	73.4

5. More specifically, the four government bodies listed in exhibit 2 above are responsible for the following:
- **Customs** – The Customs Department reports to the Chief Officer/Financial Secretary in the Finance & Economic Development Ministry (F&ED). Customs is responsible for collecting import duties (gasoline, alcohol, vehicle, tobacco, and other) and package tax, in addition to related fines and penalties, under the Customs Law and Customs Regulations.
 - **General Registry** – The General Registry reports to the Ministry of Financial Services, Commerce and Environment and is responsible for collecting revenue from services providing registry management and the maintenance of public records. General Registry activities involve the maintenance of a general register for companies, partnerships, trusts, births, deaths, marriages, public records, patents, trademarks, friendly societies, building societies, trade unions, as well as related other services to the public and clients. Its legislative authorities come from the Companies Law, Exempted Limited Partnership Law, and Trust Law.
 - **Cayman Islands Monetary Authority (CIMA)** - CIMA falls under the jurisdiction of the Ministry of Financial Services, Commerce & Environment. In addition to being responsible for the issuance, redemption, and management of Cayman Islands currency, CIMA is also responsible for collecting revenues from the financial services industry. One of CIMA’s principal functions is regulating and supervising financial services business carried out in the Cayman Islands. CIMA collects fees related to mutual fund administrators, banks and trusts licenses, security investment fees, insurance license fees, etc. CIMA’s authority is defined in the Monetary Authority Law.

- **Immigration** - Immigration falls under the Ministry of Home Affairs, Health & Culture (HAH&C). The Department's objective is to manage the growth of the country's population by regulating the flow of immigrants into the Islands and to carry out administrative processing of applications for persons seeking permanent residence, Caymanian status, work permits, visas, visitor extensions, etc. The Department is responsible for the collection of fees from the processing of these applications, including renewals, which are provided for in the Immigration Law and Immigration Regulations.
6. In addition to voluntarily remitting fees to the Government, individuals and business can make an application for a revenue waiver, or concession, for a portion or full amount of fees (e.g. customs duty, stamp duties, tourist accommodation taxes, etc.) for various reasons. The Government may grant such requests as a strategy to provide economic stimulus to various businesses or industries.
 7. Formal applications for revenue waivers are submitted to the Ministry of Finance and Economic Development (F&ED). These are reviewed by the Corporate Unit within the Ministry and forwarded to the Minister. Authority for the approval of revenue waivers with a value less than \$25,000 rests with the Minister of F&ED, who has delegated that authority to the Financial Secretary. Revenue waivers valued at more than \$25,000 must be approved by Cabinet.

ABOUT THE AUDIT

8. This is the first performance audit of the collection of government-wide revenues. Though the Government has seen consistent growth over the past five to six years, significant risks identified in the entity financial audits indicated that current practices do not lead to the maximization of the Government's revenues and to the successful collection of those revenues. As a result, the OAG believed that an audit of the management framework used for managing revenues would provide useful information to legislators.
9. The objective of the audit was to determine the extent to which the management framework for the collection of government revenues is adequate and managed effectively to ensure that Government meets its objectives. More information "About the Audit" is contained in Appendix A.
10. The scope of the audit was government wide, addressing the key revenue streams of the Government, with a focus on the 2013-14 fiscal year. Our detailed examination focused primarily on the largest revenue streams, where the risk to full collection is higher; we also included two smaller revenue streams. The revenue accounts we addressed represent 74.6% of total Government revenues and are shown in Exhibit 3.

Exhibit 3 - Revenue accounts reviewed as part of this audit

Revenue accounts	Department/ Authority	2014 revenues (\$million)	% of total revenues
Other Import Duty	Customs	91.0	14.1
Other Company Fees - Exempt	General Registry	85.9	13.3
Work Permits Fees	Immigration	56.0	8.7
Mutual Fund Administrators	CIMA	45.1	7.0
Gasoline Diesel Duty	Customs	36.0	5.6
Banks and Trust Licenses	CIMA	34.2	5.3
Partnership Fees	General Registry	31.8	4.9
Tourist Accommodation Taxes	Tourism	18.7	2.9
Alcoholic Beverages Duty	Customs	17.3	2.7
Security Investments	CIMA	13.1	2.0
Motor Vehicle Duty	Customs	11.1	1.7
Annual Permanent Resident Work Permit Fee	Immigration	9.1	1.4
Insurance Licenses	CIMA	9.1	1.4
Tobacco Products Duty	Customs	6.8	1.1
Other Company Fees - Foreign	General Registry	5.7	0.9
Environmental Protection Fund Fees	Treasury	5.0	0.8
Other Company Fees - Non-Resident	General Registry	4.0	0.6
Other Company Fees - Resident	General Registry	3.1	0.5
Total		483.0	74.6

AUDIT FINDINGS

11. We conducted walkthroughs, interviews, and document reviews to better understand the process for how revenues are managed and collected. We found that Government does not approach the task of collecting revenue with the strategy of compliance verification, whereby receipts, returns, and supporting documentation received from the public would be verified for completeness and enforcement action taken for those who fail to remit or whose remittances are incomplete. Instead, its strategy is to support voluntary compliance. Voluntary compliance means that individuals and businesses are responsible for enquiring about their compliance obligations, completely and accurately declaring the required information, accurately calculating applicable revenue due, and paying the amounts owing on the due date and in the required manner.
12. The report presents our findings in three sections:
 - governance for revenue collection;
 - efficiency and effectiveness of revenue collection activities; and
 - reporting and accountability for results.
13. The governance for revenue collection section examines the overall framework for revenue collection in the Cayman Islands and whether revenues are collected in accordance with legislation. The second section – efficiency and effectiveness of revenue collection activities – examines how revenue collection activities are integrated across government as well as whether value-for-money was achieved in revenue collection activities. The final section, on reporting and accountability for results, describes what Government reports to the public, Cabinet, and the Legislative Assembly, and how revenue performance is managed.

GOVERNANCE FOR REVENUE COLLECTION

REVENUE MANAGEMENT FRAMEWORK IN THE CAYMAN ISLANDS

14. The governance framework for revenue collection in the Cayman Islands Government has been established primarily through the Constitution, the *Public Management and Finance Law (PMFL)*, Financial Regulations (FR), the *Public Service Management Law (PSML)*, and various other laws that authorize government to collect and spend revenues in order to achieve policy objectives. Appendix B summarizes the key authorities related to collecting revenues. We also identified several principles from the Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework. The COSO framework has been used for this audit in the absence of a specific framework developed for the use of the Cayman Islands Government.
15. The PMFL and PSML contain direction for the effective management of revenues. For example, the PMFL states that no coercive revenue may be collected and no changes to rates may be made except by law. The PSML states that civil servants must strive continually for efficiency, effectiveness and value-for-money in all activities they undertake.
16. The PMFL provides for sound financial management, with its inclusion of a well-defined accountability framework for public funds. The framework includes direction on the proper management of public funds; the provision of reliable, timely and transparent information; and appropriate risk management practices. It also provides principles intended to ensure effective medium-term planning, obtaining value-for-money, effectively managing risk and delivering improved accountability³. The PMFL also provides reporting requirements with respect to government budgeting as presented in reports such as the Strategic Policy Statement and Annual Plan and Estimates.
17. An effective and efficient system of internal control is necessary to support the governance framework's requirements. While senior officials in government entities (departments, authorities, etc.) are involved in developing and implementing the accountability framework, it is the entity's Chief Officer (CO) who is accountable for ensuring that this framework is implemented effectively, including the management of the risks.
18. The current framework is decentralized. As a result, departments and authorities are required to develop and operate their own systems and processes for the management of revenues.

³ *PMFL Section 14A.(1)*

19. We found that the framework does not provide procedures for how management and staff are to document and process revenues collected. Nor does the framework provide monitoring plans for senior officials to periodically review the controls in place, and the revenues earned. Such plans would help to ensure compliance with the PMFL; they would also help to ensure value-for-money, effective risk management, and timely reporting.

GOVERNMENT COLLECTS FEES IN COMPLIANCE WITH LEGISLATION

20. It is important that Government identify potential sources of revenue while ensuring that it collects all revenues prescribed in law to meet budget commitments. It is also important that Government charges fees in a consistent manner in order to demonstrate to the public that it is charging fees fairly and doing everything it can to collect them. The responsibilities for collecting revenue are defined in law and are supported by the Government's ability to impose penalties and potentially exercise enforcement to ensure that revenues are collected.
21. We examined whether the Government was collecting revenues in accordance with prescribed legislation and in a consistent manner. We selected a statistical sample of transactions from each of the five departments and one authority included in the scope of the audit. We further examined whether changes in rates were approved in law. Our testing included a review of information recorded in revenue systems and verified with supporting documentation. We reviewed applicable legislation to validate the rates charged. We also reviewed deposit receipts to verify fees collected.
22. We found in all but six of the 494 samples selected that fees were charged in accordance with prescribed legislation. The six exceptions related to other import duties, where Customs indicated that thousands of dutiable items had been added to the tax law in March 2014, when Customs harmonized its tariff coding system with the system used by over 160 countries, including major trading partners of the Cayman Islands. In many cases the rate of duty had been incorrectly transcribed (e.g. shellfish should have been charged at a rate of 12% and not 17%). Customs is in the process of reviewing the Customs Tariff Law for such errors so that amendments can be made to correct them. However, those six examples we found during the audit have not yet been corrected.
23. We also found that Government does not ensure that revenues remitted are complete. Specifically, we noted this with regard to the collection of Tourist Accommodation Taxes and Environmental Protection Fund fees discussed in the section of this report called "Government is not ensuring it is collecting all of its revenues".

REVENUE WAIVERS ARE MANAGED POORLY

24. Given that revenue waivers reduce or remove fees prescribed in legislation, we expected that a very clear, defined, and equitable revenue waiver process would be established to ensure that all applications for revenue waivers would be treated fairly, consistently and transparently.
25. We found a process in place that defined roles, responsibilities and accountabilities for the approval of revenue waivers greater than or less than \$25,000. However, we did not find a defined or documented process, including the roles, responsibilities and accountabilities, for assessing the applications prior to approval.
26. We selected a sample of 56 revenue waiver applications for testing. Government officials were able to locate and provide supporting documents for only 39 (70%) from that sample. Poor documentation and records management were the reasons we were given for why the other files were not located. As a result, we were unable to quantify the value of revenue waivers, to conclude on the completeness of revenue waiver files, or to conclude whether revenue waivers that were granted had been approved appropriately.
27. We also found that there was no checklist with established criteria and requirements against which revenue waiver applications were assessed for approval or rejection. The use of such a checklist would help ensure that all applications are assessed fairly and consistently. Further, there was no reporting of revenue waivers as a basis to summarize the total amounts of revenue waivers granted over a given period of time.
28. Documentation of roles, responsibilities, and accountabilities would help to ensure that the processing of revenue waiver applications is transparent and consistent within the governance framework outlined in the PMFL.

Recommendation #1: The Government should formalize policies and procedures to provide documented and consistent roles, responsibilities and accountabilities for all parts of the revenue waiver process, including a set of decision criteria on which to assess revenue waiver applications and a formalized records management process.

RISKS ARE NOT BEING MANAGED

29. In today's environment of continual change and uncertainty, risk is unavoidable and is present in most governmental circumstances. A systematic approach to risk management is needed to deal with the uncertainty that surrounds future events and outcomes. Governments need to build capacity and adopt risk management practices to manage resources more effectively, make better decisions, and ultimately improve the effectiveness of the public service. Fostering a risk-informed culture and capacity helps government to improve performance. Failure to manage risks effectively can result in higher program costs and missed opportunities, which can compromise program outcomes and, ultimately, public trust.
30. We expected to find a risk management framework in place that includes a process to identify, assess, prioritize, respond to, and monitor risks to revenue objectives. A risk management framework is a set of business practices, supported by a risk management culture that assesses, communicates and manages all types of risks at a level appropriate to the Government's risk profile and opportunities. For a government of the size and complexity of the Cayman Islands Government, a risk management framework could be integrated horizontally across departments, and vertically at multiple levels of government. It could include the development of risk registers at the unit or departmental level, communicated up to senior management for developing ministerial risk registers that would feed into the development of a government-wide risk profile.
31. To assess what risk management practices were in place regarding the collection and management of revenues, we conducted interviews and document reviews. We found that within the five departments and one authority we examined, there were no formal risk management processes. Risk management was conducted informally and discussed as needed in management meetings, but there was no defined and consistent process to identify, assess and manage risks.
32. We found limited discussion of risks in the Annual Budget Statement, which is an annual report detailing the budgets of each ministry, portfolio and office in Government. In some entities, risks were identified related to revenues; however, when we inquired management regarding their process for identifying and assessing risks only one department mentioned that they provided input into the identification of these risks (General Registry). Otherwise, the process for risk identification was carried out at by individuals outside the entities and were likely not relevant to their operations.
33. We concluded that Government is not adequately managing risks to its responsibilities for the collection of revenue.

Recommendation #2 – The Government should implement a formal risk management framework that includes the identification, assessment and prioritization of risks to revenue objectives.

EFFICIENCY & EFFECTIVENESS OF REVENUE COLLECTION ACTIVITIES

MANAGING THE COLLECTION OF GOVERNMENT REVENUES

34. The collection and management of revenues are important functions of the Government and are of significant interest to the public, Cabinet, and the Legislative Assembly. An efficient and effective management control framework for Government revenue is essential to provide the kind of stewardship and accountability expected by the people of the Cayman Islands.
35. To ensure that operations are efficient and effective, management needs to establish structures, oversight, reporting lines, and appropriate authorities and responsibilities in pursuit of objectives, with ministerial and Cabinet oversight. This is known as a control framework.
36. More than 30 separate pieces of legislation prescribe the services and activities for which revenues are collected by the Cayman Islands Government. Eight ministries and two portfolios consisting of over 50 departments, sections and authorities are responsible for collecting and managing revenues.
37. Given the large number of government bodies accountable for managing revenues, we expected to find a strategic and centrally defined management control framework in place to provide the best value-for-money in managing Government revenues. At a minimum, such a framework would include the following:
- Legislation and regulations – high-level policy direction to ensure revenues are collected for Government services and activities.
 - Organization and responsibility –someone responsible for ensuring the effective collection and management of revenues across Government.
 - Policies – guidance within the public service to ensure that revenues are realized in accordance with the legislation and regulations and that the Government obtains value for money.
 - Procedures – clear direction for how management and staff document and process revenues collected. This could include, for example, a procedures manual.
 - Monitoring – periodic review by senior officials of the controls in place and of the revenues earned to ensure that policies and procedures are followed.
 - Reporting – periodic proactive public reporting of Government revenues to provide transparency and accountability for the activities of public servants and elected officials.

THE REVENUE COLLECTION PROCESS IS INEFFICIENT

38. A system interface is a direct connection between systems that allows for efficient and automatic transfer of information in a clearly defined manner (e.g. real-time, daily, weekly, etc.). With automatic system interfaces in place, minimal effort is required to upload financial and accounting information between systems. In addition, automatic system interfaces allow for better results and timelier reporting that decision makers can use to make more informed decisions. Furthermore, given the higher risk of input and data errors with manual entries, automatic interfaces lead to fewer errors and more accurate reporting.
39. Accordingly, we looked for revenue collection computer systems that were integrated with each other and that automatically transferred pertinent data via system interfaces. For example, we expected that departmental systems used by officials to record the collection of revenues would be linked automatically to IRIS, the governmental financial reporting system.
40. We found that revenue and information systems were not well integrated between departments, or centrally into IRIS. In our limited review, we identified some areas, discussed below, where better system integration and automation could be beneficial.
41. General Registry and CIMA have similar clients and similar systems, with agents or administrators responsible for a large block of customers. To process their customers' payments, these agents have to set up separate accounts with both General Registry and CIMA. With General Registry, using the CORIS⁴ system, agents can process transactions online and charges are drawn from their escrow account, while with CIMA they must process transactions manually and CIMA's staff enters the transactions into the MARS⁵ system manually. Recognizing the need for independence of operations, integrating their online systems and sharing of information between these two systems would improve the efficiency of processing such transactions, eliminate various manual processes, and make it more efficient for clients paying their fees. This would lead to cost savings.

⁴ CORIS is a General Registry on-line system available to service providers allowing them to have remote access to information on companies they are charged to administer. These service providers can perform various company administrative functions (e.g. document filing, change of director notification, etc.) on behalf of their clients.

⁵ MARS is a database system used by CIMA where entitlement information (e.g. banking, trust, security, investment) is maintained for CIMA's clients.

42. Tourism receives monthly Tourism Accommodation Tax (TAT) returns and the information received is manually entered into the Tourism Revenue Production System. There is an opportunity to automate this process by having properties (hotels, condos, and timeshares) submit their TAT returns and supporting documentation online. Doing so would improve efficiencies by reducing both the time and resources needed to manually input monthly TAT returns and the errors that can occur with manual entry.
43. The Treasury Department receives information from the Cayman Island Airport Authority (CIAA) that does some limited verification when it is received from the airlines. Treasury uses this information to determine the number of passengers that arrive in the Cayman Islands and to charge airlines a fee for the Environmental Protection Fund (EPF). Treasury currently has no information to independently assess whether the passenger figures provided by the airlines are complete or accurate. By integrating with the Immigration Department, which has information on passenger arrivals, Treasury could ascertain the completeness and accuracy of information submitted by the airlines. Treasury indicated to us that starting in early 2015 it started to receive data from Immigration to assess information from the airlines; however, this process is new and is still being tested.
44. Of the five departments and one authority audited, we noted that only the Department of Immigration had a revenue system directly interfaced with IRIS. Treasury also directly posts to IRIS transactions related to the EPF. The other three departments and one authority manually post daily batch entries into IRIS. This manual process increases opportunities for errors. In addition, it requires additional effort that could be avoided if all revenue systems were interfaced with IRIS.
45. We also found some areas where efficiencies could be gained through further streamlining and integration of revenue management processes. For example, in the main lobby of the Government Administration Building (GAB) there are 12 to 15 wickets where revenue receipts and transactions are processed for different departments, authorities and Government agencies (e.g. Lands and Survey, Treasury, Maritime Authority, etc.). Staff processing transactions at these wickets are underutilized— the wickets each have different operating hours, and staff who process transactions at one wicket do not process transactions at other wickets. Further, members of the public coming to conduct multiple transactions may have to visit multiple wickets. There is an opportunity to better utilize staff assigned to the wickets, provide better service, and save money spent on resources that may not be required.
46. As a result of our findings, we concluded that Government does not use its resources efficiently. In several areas we found an inefficient use of resources and processes that could be streamlined by integrating revenue systems and revenue processing wickets between departments, authorities, and other Government agencies. Doing so could lead to significant savings related to system overhead costs and staffing, and the automation of key processes could also reduce errors.

Recommendation #3 – The Government should carry out an efficiency study of its revenue collection processes and identify opportunities to improve operational efficiencies, including better utilization of its people and its automated systems, to provide value-for-money in its revenue collection practices.

GOVERNMENT IS NOT ENSURING IT IS COLLECTING ALL OF ITS REVENUES

47. We expected to find revenue collection process and control frameworks in place to ensure that individuals and businesses submit fees required by legislation on a timely and accurate basis.
48. The Tourism Department collects fees monthly from properties such as hotel rooms, condos, etc. that are rented to visitors to Cayman. These properties are required by law to collect a 13% Tourist Accommodation Tax, or TAT, on top of the room rates charged. Each month, tourist accommodation operators are required to submit the TAT collected along with a “Monthly TAT Return” and supporting information. Supporting information includes a summary of the invoices provided to each guest detailing the number of nights of the stay, the room rate, and the taxes charged.
49. Each month, the Tourism Department manually enters financial data from the TAT returns into the Tourism Revenue Production System (TRPS). Tourism officials check to ensure that properties have submitted their monthly returns and that the information on the returns is accurate. Amounts are recalculated (e.g. taxes, foreign exchange amounts, totals), some samples of transactions listed on TAT returns are verified against supporting documentation, and returns agreed against amounts remitted.
50. We expected to see controls in place to ensure that properties were remitting the full amount of TAT collected. This would include periodic site visits or audits by Tourism officials to verify the completeness of information and the TAT remitted.
51. We found that the Tourism Department does not ensure that the information supporting TAT collected is complete. The Tourism Department conducts site inspections but those inspections are specifically to assess whether properties are built and maintained in accordance with regulations. There is an opportunity to train the inspector or hire additional inspector to review for completeness the source information on which properties base their monthly TAT returns.
52. We reviewed a sample of 22 TAT returns. Of that sample, we found three instances where the appropriate documentation was not provided to support the TAT remitted. No action had been taken to obtain the required documentary support.
53. We were informed that subsequent to the period covered by the audit that procedures have been put in place to notify properties submitting incomplete documentation.

54. With regard to the Treasury Department's collection of EPF fees, as previously mentioned, Treasury does not verify whether the information received from the airlines is complete. Treasury simply uses the total number of passengers reported by the airlines and sends a monthly bill to the airlines for the EPF fee.
55. We expected to find a method in place to verify passenger figures received from the airlines, such as a cross-check with Immigration records that indicate how many international passengers have arrived at the airport.
56. We found that there was no verification of passenger numbers for the 2013-14 fiscal year. Only recently in 2015 has Treasury begun to receive data from Immigration; however, this data is still being analyzed and tested to determine how best to use it to verify information from the airlines.
57. From the audit work performed, we concluded that Government does not do enough to ensure the completeness of revenues from TAT and EPF. There are likely other areas of revenue collection not reviewed by our audit where revenue completeness is not ensured.

Recommendation #4 – The Government should review its control frameworks for collection of revenues and, where necessary, develop and implement appropriate controls to ensure that all revenues due to the Government are collected.

AN OVERLY COMPLEX PROCESS FOR COLLECTING WORK PERMIT FEES CAN LEAD TO ERRORS

58. Legislation specifies over 5,000 different fees for work permits in Cayman Islands. At December 31, 2014 there were 16,603 work permits in effect; and from 2004-2014 an average of 16,833 work permits were in effect⁶.
59. In the *Immigration Regulations (2013 Revision)*, work permit fees are specified by occupation and then by island (Grand Cayman, Cayman Brac, and Little Cayman). As a result, each occupation for which work permit fees are charged has a different fee based on the island of employment. Different fees also exist for the same occupation, depending on which industry the work permit is issued for. So, for example, the fee for an accountant applying for a Grand Cayman work permit in the insurance industry is \$13,650, while the fee for the same accountant would be \$10,400 for a Grand Cayman work permit in the building installation sector.

⁶ Department of Immigration Quarterly Statistical Report – December 2014

60. During interviews management informed us that the work permit application process is complex. This is due in part to the large number of different work permit fees in the legislation and the number of Immigration officials involved in the application process before a decision is made.
61. In addition, departmental managers indicated that because of the complexity of the fee structure and the process, they have not been able to focus on actively administering work permits and issuing administrative fines. Administering work permits would include ensuring that those in the work force have an active work permit, and those with an active work permit are employed in the profession and industry indicated in their work permit application. Thus, simplifying the process could also lead to better administration of work permits, which could lead to more effective enforcement and the collection of potential fines.
62. Based on transaction testing, we found that the Immigration Department granted work permits for occupations not specified in the Immigration Regulation. For example, we found a work permit granted for the occupation of “Caregiver” and, while no such occupation was found in the regulation, we did find a similar occupation, “Domestic Helper”. Out of 42 work permits we sampled, we found 10 similar cases where the occupation approved on the work permit did not match an occupation listed in the regulations. In these 10 cases the fee charged was for an occupation with a very similar description (such as Domestic Helper rather than Caregiver); however, we were unable to conclude that the correct work permit fees were collected. Occupations in the Regulations are very specific, whereas efficiencies could be gained if occupations were, for example, categorized with a list of several related occupations in each category.
63. Decreasing the number of occupations and fees specified in the legislation could make the process simpler. A simpler process would allow for the swifter processing of work permit applications and thus improve service to the public.
64. We have therefore concluded that the process used by Government to collect immigration fees is inefficient and prone to allowing errors in the recording of the information in the accounting system.

Recommendation #5 – The Government should review the current framework for the collection of work permit fees to streamline the fee structure and work flows in order to improve efficiency and reduce the opportunity for improper recording of revenue collection information.

REPORTING AND ACCOUNTABILITY FOR RESULTS

GOVERNMENT GENERATES APPROPRIATE INFORMATION TO SUPPORT DECISION MAKING

65. Decision makers, both in the Legislative Assembly and in senior Government positions, need to be well-equipped with information that is relevant, sufficient and useful. We expected to find revenue reports that provide both qualitative and quantitative analyses of revenue results for management to assess past performance and to forecast future situations.

66. To assess whether the Government has the necessary information to support decision making, we reviewed annual budgets for the past five years and compared them to actual results based on unaudited information provided by Government officials to the Legislative Assembly. We found that the variances from budget over the last five years were quite reasonable, as demonstrated in Exhibit 4 below.

Exhibit 4 - Variance of Total Revenue (Actual to Budget)⁷

Year	Amount (\$ million)	Over / (Under) %
2010	9.2	2.72
2011	7.7	2.15
2012	3.3	0.88
2013	(0.1)	(0.02)
2014	7.3	1.52

67. The average variance of revenue actual to budget for the 18 revenue sources we reviewed was 1.45% over budget during the five-year period assessed.

⁷ Variance based on scoped in accounts as listed in paragraph 11

68. We noted that the Ministry of F&ED generates the following reports for Cabinet and, at the same time, releases to the public:

- **Annual Plan and Estimates** - The Annual Plan and Estimates (AP&E) is the Government's main budget document and provides a summary of the Government's planned policy actions and forecasted financial performance for the financial year. These planned actions reflect the outcomes, goals, fiscal strategy and priorities established by Cabinet. This plan also provides the budgeted revenues for the current fiscal year as well as the unaudited results of the most recently completed two fiscal years.
- **Annual Budget Statement** - The Annual Budget Statements (ABS) details the budget for each Ministry, Portfolio and Office, and documents in detail the output delivery and ownership performance expected of each agency for the upcoming financial year.
- **Strategic Policy Statement (SPS)** - The SPS is meant to provide a summary of the broad outcomes, specific outcomes, and the links between them and what the Governor in Cabinet intends to achieve in the next three years.

69. Government is responsible under the PMFL to report to the Legislative Assembly how well it is managing and collecting revenues. We found that the Ministry of F&ED produces periodic unaudited financial reports for Cabinet. The reports effectively compare actual results to budget as well as historical results; however, we found their timeliness to be inconsistent and at times, they were significantly late for use in decision making.

70. We noted that the Revenue Management Unit (RMU) within the Ministry of F&ED is responsible for preparing revenue budgets and forecasts for the Government.

71. Monthly forecasts are primarily based on historical amounts and trends, while for annual forecasts the RMU uses dynamic regression models (models conditional on revenue drivers and historical values). For annual budgets the RMU also consults with Departments, who prepare their own budgets. The aim is that the RMU and Departments will work together to agree on a budget but, in the end, the RMU makes the final decision.

72. Departments noted in our interviews that in the past there were challenges to setting budgets with the RMU. They indicated that the RMU would change budgets they had submitted and then Departments would have to explain variances from budgets they had not set. Departments expressed that the budgeting process has now improved, with more negotiation and collaboration, so that both parties agree on the budget before it is finalized.

73. We reviewed Cabinet papers that analyzed the purpose and impact of changes to rates and fees. For example, an analysis of proposed changes to various customs duties included consideration of the financial, legal, and civil service impact. However, the analysis was far less comprehensive than we would have expected.

74. We concluded that Government makes decisions regarding its revenue collection activities using relevant financial information and analysis. However, improvement is required to make these reports more timely. The inability of the Government to produce audited Entire Public Sector consolidated financial statements precludes the accountability required for Government revenues.

Recommendation #6 – Government should ensure that timely financial reports are provided to Cabinet and the Legislative Assembly and that more emphasis is placed on producing audited Entire Public Sector consolidated financial statements to provide the necessary accountability required by the PMFL.

PERFORMANCE IS NOT MEASURED OR REPORTED

75. Performance measurement is critical to the successful management of public resources. It is important to measure performance because it provides the information needed to improve the management and delivery of services to the public and provide the necessary accountability to the Legislative Assembly and the public.

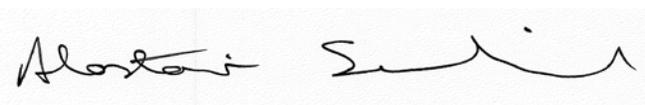
76. We expected that core Government and authorities would have in place some element of a performance measurement framework to assess their success and their ability to meet revenue objectives. We found the five departments and one authority did not have such a framework. When we asked Government officials about this, they indicated that they simply assess actual results versus budget in order to assess performance.

77. While meeting budgets is important to ensure that revenues are collected to fund planned expenditures, there are other means to assess whether operations are performing efficiently and economically.

Recommendation #7 – The Government should develop a performance reporting framework including objectives, goals, performance indicators and performance analysis that would include responsibilities for the collection of revenue.

CONCLUSION

78. The objective of this audit was to assess the adequacy and effectiveness of the management framework in place to ensure that the Government meets its revenue objectives. We concluded that the collection of revenues is, in most instances, being carried out in accordance with legislation.
79. However, improvements are needed in key aspects of the revenue management framework to ensure that Government obtains better value-for-money from its revenue collection activities and that it meets its revenue objectives. We found that fundamental public sector management practices such as ensuring cost-effectiveness of operations, risk management, and reporting on performance were weak or non-existent.
80. It is important that the Government address significant weaknesses in how it manages the systems for revenue collection, how it records its revenue transactions, and how it reports the amounts collected. We found several areas where controls were not operating effectively, and where greater efficiencies could be achieved if more were done to integrate revenue collection processes.
81. While there are several areas for improvement, we are particularly concerned about the lack of an effective management framework for the processing of revenue waivers. The deficiencies we noted prevented the audit team from completing its audit work in this important area, thus creating a significant scope limitation. The lack of systems and documentation we found during the audit should be of great concern to Legislators, who would expect that decisions made are based on clearly documented criteria applied in a fair and consistent manner.
82. Another significant area that needs improvement is the collection of work permit fees. We found an overly complex framework that required lengthy processing times for work permit applications and an inefficient use of resources to collect revenue.
83. We have made seven recommendations that highlight the need to strengthen the management of revenue collections. Our inability to complete some of the planned audit work should provide the impetus for immediate action by senior officials in Government to implement the recommendations in this report.



Alastair Swarbrick MA(Hons), CPFA, CFE
Auditor General
George Town, Grand Cayman
Cayman Islands

28 September 2015

APPENDIX A – ABOUT THE AUDIT

OBJECTIVE

1. The objective of the audit was to assess the adequacy and effectiveness of the management framework in place to ensure that the Government meets its revenue objectives.

CRITERIA

2. Audit criteria are a key component of a performance audit, setting out the expectations the auditor will use to assess performance and to conclude on the audit objectives. Normally, the criteria reflect regulatory requirements and established business practices that management uses to assess its own performance. In the absence of those practices, it is the auditor’s responsibility to develop criteria that are reasonable under the circumstances based on best or reasonable practices and, to the extent possible, obtain agreement from the organization being audited.
3. The audit criteria were based on applicable requirements of the PFML, which provides in legislation, amongst other things, various requirements for the sound management of government revenues. In addition criteria were established based on elements of the Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework. The COSO Framework provides thought leadership to executive management and governance entities on critical aspects of organization governance, business ethics, internal control, enterprise risk management, fraud, and financial reporting.
4. The audit used four (4) sub-objectives against which we evaluated the audit findings. The Deputy Governor agreed with our criteria at the outset of the audit, which are the following:
 - revenue is collected fairly and consistently in compliance with legislation;
 - operations are efficient in the collection of revenues to ensure value for money is achieved;
 - relevant financial information and analysis is available to enable the government to project revenues in support of planning its activities and budgeting its spending; and
 - public (financial and non-financial) reporting provides assurance of accountability and stewardship for the collection and use of public resources.

SCOPE

5. The scope of the audit was government-wide, addressing the significant revenue streams of the Government, with a focus on activity and transactions of the 2013-14 fiscal year. Given the large number of revenue sources across the Government, detailed examination of revenue streams focused primarily on the largest sources of revenue, where there is a higher level of risk for the collection of government revenues, and on two other, smaller revenue streams. The focus of our audit work was on the following, which account for 74.6% of Government revenues:

- Import duties (Department of Customs)
- Company fees (Department of General Registry)
- Financial Industry Fees (Cayman Islands Monetary Authority)
- Work Permit Fees (Department of Immigration)
- Environmental Protection Fund Fees (Treasury)
- Tourist Accommodation Chargers (Tourism)

APPROACH

6. We conducted our audit in accordance with International Auditing Standards, which included:

- obtaining the agreement of management to the audit criteria;
- documenting statutory requirements, policies and practices for the management and collection of revenues for the revenue streams within our audit scope;
- conducting interviews of senior officials, including CFOs and Department heads, who are responsible for the management and collection of revenues;
- conducting testing of samples related to significant revenue streams;
- analysing audit evidence and assessing against criteria to develop findings, recommendations and conclusions;
- providing a draft audit report to management for review of factual accuracy and obtaining responses to the report's recommendations (see Appendix D); and
- presenting a final report of the audit to the Legislative Assembly.

STAFF

7. The audit was led by Martin Ruben, FCPA, FCGA – Performance Audit Principal, assisted by consultants from an accounting firm in the Cayman Islands and staff from the Office of the Auditor General.

APPENDIX B – AUDIT CRITERIA AND SOURCES BY SUB-OBJECTIVE

Sub-Objective	Audit Criteria	Source
<p>#1. Revenue is collected fairly and consistently in compliance with legislation.</p>	<ul style="list-style-type: none"> • Executive (coercive) revenue is collected, at the appropriately defined rates, in accordance with defined legislation. • The organization deploys control activities through policies that establish what is expected and procedures that put policies into action. • The organization identifies, assesses and manages risks with respect to its revenue objectives. • The organization considers the potential for fraud in assessing risks to the achievement of objectives. 	<ul style="list-style-type: none"> • <i>Public Management and Finance Law (2013 Revision)</i> - Article 6 (1) • Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework – Principle 12 • Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework – Principle 7 • Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework – Principle 8
<p>#2: Operations are efficient and effective in the collection of revenues, to ensure value for money is achieved.</p>	<ul style="list-style-type: none"> • Management establishes, with ministerial and cabinet oversight, structures, reporting lines, and appropriate authorities and responsibilities in pursuit of objectives. • The organization holds individuals accountable for their internal control responsibilities in the pursuit of objectives. 	<ul style="list-style-type: none"> • Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework – Principle 3 • Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework – Principle 5
<p>#3: Relevant financial information and analysis is available to enable the Government to project revenues in support of planning its activities and budgeting its spending.</p>	<ul style="list-style-type: none"> • The government generates relevant, quality information to support decision making regarding revenue management. 	<ul style="list-style-type: none"> • Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework – Principle 13

Sub-Objective	Audit Criteria	Source
<p>#4: Public (financial and non-financial) reporting provides assurance of accountability and stewardship for the use of public resources.</p>	<ul style="list-style-type: none"> • The organization obtains or generates and uses relevant, quality information to assessment of performance. • The government communicates with Cabinet, the Legislative Assembly and the public regarding matters affecting the collection and management of revenue 	<ul style="list-style-type: none"> • Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework – Principle 13 • Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework – Principle 15

APPENDIX C – LAWS, REGULATIONS AND POLICIES

Laws, Regulations and Policies	Description
<p>Public Management and Finance (PMFL) and Financial Regulations (FR)</p>	<p>The <i>PMFL</i> came into effect in 2003 and its regulations in 2004 to improve financial management in the Cayman Islands Government. The need for improvement was identified in the late 1990's when it was realized that separate initiatives for change had not been successful and a more holistic approach was necessary.</p> <p>Key Referenced Section of <i>PFML</i>:</p> <p>6. (1) No coercive revenue may be collected and no changes to rates of coercive revenue may be made except by authority of a law.</p> <p>18. During the strategic phase, the Governor in Cabinet shall -</p> <p>(a) determine for the next financial year and the following two financial years –</p> <p style="padding-left: 40px;">(iii) the forecast total amount of executive revenue and expenses for each financial year;</p> <p style="padding-left: 40px;">(vi) the forecast total amount of core government revenue, expenses, borrowing and net worth;</p> <p>19. During the detailed planning and budgeting phase each minister and official member shall -</p> <p>(a) in conjunction with the ministry or portfolio for which he is responsible, determine the outputs, transfer payments, equity investments, changes to fees for Government services and legislative measures that he proposes to influence the specific outcomes agreed by the Governor in Cabinet;</p> <p>21. During the Legislative Assembly review phase -</p> <p>(a) the Minister of Finance on behalf of the Governor in Cabinet shall outline the annual plan and estimates to the Legislative Assembly; and</p> <p>(b) the Legislative Assembly shall review the annual plan and estimates and authorise the Governor in Cabinet to give effect to that plan (amended as required by the Legislative Assembly) by-</p> <p style="padding-left: 20px;">(i) authorising, by law, changes to types of coercive revenue or rates of coercive revenue;</p> <p>23. (1) The strategic policy statement for the next financial year shall be presented to the Legislative Assembly by a member of the Governor in Cabinet appointed by the Governor in Cabinet to do so on their behalf not later than the 1st December in each year for approval within two months, and if the Legislative Assembly has not within that period resolved to approve, amend or reject the statement it shall be deemed to be approved.</p>

Laws, Regulations and Policies	Description
	<p>39 (2) It is the responsibility of the chief officer to determine and acquire the inputs required to produce the outputs specified in his finalized annual budget statement and, subject to section 40, no decision or action in relation to inputs shall be made or taken by or on behalf of a ministry or portfolio for the purposes of this Law unless that decision or action has been made, taken or agreed by the chief officer of the ministry or portfolio.</p> <p>Key Referenced Section of FR:</p> <p>44(1) which Under Part XI - Financial Record Keeping: "A prescribed entity, statutory authority or government company is required to retain records pertaining to output reporting entity financial transactions.....in such a manner that such records can be readily produced for operational and audit purposes.</p>
<p>Public Service Management Law (PSML) and Personnel Regulations (PR)</p>	<p>The <i>PSML</i> was enacted in 2005 and its regulations in 2006. Its purpose was to delegate greater personnel authority to Chief Officers in order for them to fulfill the duties they had been given under the <i>PMFL</i>. The legislation was designed to complement the financial management reforms so that the government management system would operate as a single integrated system.</p> <p>By establishing a statement of values to govern the operation of the civil service and a code of conduct to specify personal behaviors, the legislation set out to encourage civil servants to behave and perform in an effective manner.</p>
<p>Committee of Sponsoring Organizations of the Treadway Commission (COSO) Framework</p>	<p>The COSO Framework is a common internal control model which organizations may assess their control systems against. It provides thought leadership to executive management and governance entities on critical aspects of an organizational governance, business ethics, internal control, enterprise risk management, fraud, and financial reporting.</p> <p>Key Referenced Principles of COSO:</p> <p>Principle 3 – Management establishes, with board oversight, structures, reporting lines, and appropriate authorities and responsibilities in the pursuit of objectives.</p> <p>Principle 5 – The organization holds individuals accountable for their internal control responsibilities in the pursuit of objectives.</p> <p>Principle 7 – The organization identifies risks to the achievement of objectives across the entity and analyzes risks as a basis for determining how the risks should be managed</p> <p>Principle 8 – The organization considers the potential for fraud in assessing risks to the achievement of objectives.</p> <p>Principle 12 – The organization deploys control activities through policies that establish what is expected and procedures that put policies into action.</p>

Laws, Regulations and Policies	Description
	<p>Principle 13 – The organization obtains or generates and uses relevant, quality information to support the functioning of other components of internal control.</p> <p>Principle 15 – The organization communicates with external parties regarding matters affecting the functioning of other components of internal control.</p>

APPENDIX D – RECOMMENDATIONS

Recommendations	Management Response	Responsibility	Date of planned implementation
<p>1. The Government should formalize policies and procedures to provide documented and consistent roles, responsibilities and accountabilities for all parts of the revenue waiver process, including a set of decision criteria on which to assess revenue waiver applications, and a formalized records management process.</p>	<p>Management agrees with this recommendation.</p>	<p>Financial Secretary & Chief Officer</p>	<p>31 December 2016.</p>
<p>2. The Government should implement a formal risk management framework that includes the identification, assessment and prioritization of risks to revenue objectives.</p>	<p>Management agrees with this recommendation.</p>	<p>Deputy Governor and Financial Secretary & Chief Officer</p>	<p>Consideration will be given to the implementation along with the PMFL Review Committee recommendations which is currently proposed to be legislated by 31 December 2016.</p>

Recommendations	Management Response	Responsibility	Date of planned implementation
<p>3. The Government should carry out an efficiency study of its revenue collection processes and identify opportunities to improve operational efficiencies, including better utilization of its people and its automated systems to provide value-for-money in its revenue collection practices.</p>	<p>Management agrees with this recommendation.</p>	<p>Deputy Governor and Financial Secretary & Chief Officer</p>	<p>31 March 2017</p>
<p>4. The Government should review its control frameworks for collection of revenues and, where necessary, develop and implement appropriate controls to ensure that all revenues due to the Government are collected.</p>	<p>Management agrees with this recommendation. However, Management would like to note that the Customs Department receives reports from CUC on a monthly basis. These reports are compared with the declarations made by the fuel companies. Additionally, the fuel sold to CUC is stored in specifically assigned tanks for the sale to CUC ONLY. These tanks are monitored during the monthly dips confirming that the figures being declared are accurate.</p>	<p>Financial Secretary & Chief Officer</p>	<p>31 December 2016</p>
<p>5. The Government should review the current framework for the collection of work permit fees to streamline the fee structure and work flows in order to improve efficiency and reduce the opportunity for improper recording of revenue collection information.</p>	<p>Management agrees with this recommendation</p>	<p>Chief Officer – Ministry of Home Affairs</p>	<p>To be determined</p>

Recommendations	Management Response	Responsibility	Date of planned implementation
<p>6. Government should ensure that timely financial reports are provided to Cabinet and the Legislative Assembly and that more emphasis is placed on producing audited Entire Public Sector consolidated financial statements to provide the necessary accountability required by the PMFL.</p>	<p>Currently the Ministry of Finance provides monthly financial reports to the Minister for Finance and quarterly financial reports to Cabinet within the agreed timelines. Additionally, the PMFL only requires the annual financial statements be presented to the Legislative Assembly. EPS accounts have been submitted to the Auditor General's within the Statutory deadline for the past three fiscal years.</p>	<p>Financial Secretary & Chief Officer</p>	<p>In compliance with Cabinet directives and PMFL.</p>
<p>7. The Government should develop a performance reporting framework including objectives, goals, performance indicators and performance analysis that would include responsibilities for the collection of revenue.</p>	<p>Management will review this recommendation in line with the PMFL Review Committee recommendations accepted by Cabinet.</p>	<p>Financial Secretary & Chief Officer</p>	<p>Consideration will be given to the implementation along with the PMFL Review Committee recommendations which is currently proposed to be legislated by 31 December 2016.</p>

Contact us

Physical Address:

3rd Floor Anderson Square
64 Shedden Road, George Town Grand Cayman

Business hours:

8:30am - 4:30pm

Mailing Address:

Office of the Auditor General
P. O. Box 2583 Grand Cayman KY1- 1103
CAYMAN ISLANDS
Email: auditorgeneral@oag.gov.ky
T: (345) 244 3211 Fax: (345) 945 7738

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To make a complaint about one of the organisations we audit or about the OAG itself, please contact Garnet Harrison at our address, telephone or fax number or alternatively email: garnet.harrison@oag.gov.ky

Freedom of Information

For freedom of information requests please contact Garnet Harrison at our address, telephone or fax number. Or alternatively email: foi.aud@gov.ky

Media enquiries

For enquiries from journalists please contact Martin Ruben at our phone number or email: Martin.Ruben@oag.gov.ky



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